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11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,) No.: CR 06-0181 VRW
16 Plaintiff,)
17 v.) STIPULATION AND [PROPOSED]
18 JOSE JESUS QUINONES,) ORDER EXCLUDING TIME UNDER
19 Defendant.) THE SPEEDY TRIAL ACT

20 On Tuesday, August 1, 2006, the parties appeared before the Court for a status hearing
21 and motions and trial setting. The United States was represented by Assistant United States
22 Attorney Dennis Michael Nerney. Defendant Jose Quinones was represented at the proceeding
23 by Daniel Blank of the Office of the Federal Public Defender. The case was set for a further
24 status hearing and/or guilty pleas by the defendant..

25 During the proceeding, the Defendant Quinones and the government jointly requested a
26 continuance of the case to Tuesday, August 15, 2006 at 10:30 a.m for guilty pleas or a further
27 status hearing. The parties agreed that for such reason, counsel for the defendant would require a
28 reasonable amount of time to confer with his client and government counsel in order to resolve
the case. The parties requested the continuance in order to give the defendant and the

1 government an opportunity to accomplish this objective.

2 The parties jointly requested that the time period from August 1, 2006 through and
 3 including August 15, 2006 be excluded from the calculation of time under the Speedy Trial Act.
 4 The defendant, through his counsel, consented to this exclusion of time.

5 Specifically, the parties moved to have the time from August 1, 2006 through and
 6 including August 15, 2006 excluded from the time limits set forth in the Speedy Trial Act, 18
 7 U.S.C. § 3161, on the ground that failure to exclude the time would unreasonably deny counsel
 8 for the defendant the reasonable time necessary for effective preparation of counsel, taking into
 9 account the exercise of due diligence. 18 U.S.C. § 3161(h)(8)(B)(iv). In addition, the ends of
 10 justice would be served by the Court excluding the proposed time period; these ends outweigh
 11 the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(8)(A),
 12 (B)(iv).

13 With the consent of the parties, the period from August 1, 2006 through and including
 14 August 15, 2006 shall be excluded from the Speedy Trial Act calculation under 18 U.S.C.
 15 § 3161(h)(8)(A) and (B)(iv).

16 SO STIPULATED.

18 DATED: 08/07/06

/s/ Daniel Blank
 DANIEL BLANK
 Counsel for Jose Jesus Quinones

21 DATED: 08/03/06

/s/ Dennis Michael Nerney
 DENNIS MICHAEL NERNEY
 Assistant United States Attorney

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 DATED: August 14, 2006


 VAUGHN R. WALKER
 UNITED STATES DISTRICT JUDGE